

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,
HARPERCOLLINS PUBLISHERS LLC,
JOHN WILEY & SONS, INC., and PENGUIN
RANDOM HOUSE LLC,

Plaintiffs,

v.

INTERNET ARCHIVE and DOES 1 through
5, inclusive,

Defendants.

Case No. 1:20-CV-04160-JGK

**NOTICE OF MOTION FOR LEAVE TO
FILE AMICUS CURIAE BRIEF**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and proposed brief by *Amici Curiae*, The Authors Guild, Inc., Western Writers of America, Canadian Authors Association, American Photographic Artists, The Writers' Union of Canada, International Authors Forum, American Society of Media Photographers, Romance Writers of America, Society of Children's Book Writers and Illustrators, European Writers Council, National Writers Union, Graphic Artists Guild, American Society for Collective Rights Licensing, Society of Authors, Sisters in Crime, International Federation of Journalists, Dramatists Guild of America, National Press Photographers Association, Novelists Inc., Association of Authors Agents, The American Society of Journalists and Authors, The Union des Écrivaines et des Écrivains Québécois, and European Visual Artists (collectively, "Amici"), by their attorneys Reitler Kailas & Rosenblatt LLP, hereby moves this Court at the Courthouse located at Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007-1312, on September 6, 2022, at 9:30 a.m., or as soon thereafter as counsel can be heard for an Order permitting the Guild to file an amicus curiae brief in support of the plaintiffs Hachette Book Group, Inc.'s, Harpercollins Publishers LLC's, John Wiley & Sons, Inc.'s, and Penguin Random House LLC's motion for summary judgment.

See ECF Doc. No. 99. The reasons for granting *Amici's* motion are stated in the accompanying memorandum of law and proposed amici curiae brief.

The parties have consented to the submission of this brief by *Amici*.

Dated: August 12, 2022

Respectfully submitted,

REITLER KAILAS & ROSENBLATT LLP

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